

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 23-02305
Elizabeth Caymares,	:	Chapter 13
	:	Judge Mark J. Conway
Debtor.	:	*****
	:	
Elizabeth Caymares,	:	
	:	Related Document No. 50
v.	:	
	:	
Guild Mortgage Company LLC	:	
Jack N Zaharopoulos,	:	
Respondents.	:	

**OBJECTION OF GUILD MORTGAGE COMPANY LLC
TO THE CONFIRMATION OF THE PLAN (DOCKET NUMBER 50)**

Guild Mortgage Company LLC ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed plan ("Plan") filed by Elizabeth Caymares ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 137 Dad Burnhams Rd, Pine Grove, PA 17963 ("Property").
2. Creditor filed Proof of Claim Number 6 in the amount of \$390,572.60. This amount includes a pre-petition arrearage in the amount of \$993.33.
3. Debtor's Plan does not provide for ongoing post-petition mortgage payments on Creditor's Claim.
4. Debtor's Plan represents an impermissible modification of Creditor's claim and a

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violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/Alyk L. Oflazian

Alyk L. Oflazian, Esquire (312912)

Adam B. Hall (323867)

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Attorneys for Creditor

The case attorney for this file is Alyk L. Oflazian.

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	:	Judge Mark J. Conway
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	:	
Elizabeth Caymares,	:	
	:	Related Document No. 50
Movant,	:	
v.	:	
	:	
Guild Mortgage Company LLC,	:	
	:	
Jack N Zaharopoulos,	:	
	:	
Respondents.	:	

I certify that on the date of filing, a copy of the foregoing Objection of Guild Mortgage Company LLC to the Confirmation of the Amended Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Michael A. Cibik, Attorney for Elizabeth Caymares, help@cibiklaw.com

Elizabeth Caymares, 137 Dad Burnhams Rd, Pine Grove, PA 17963-8388

Case 5:23-bk-02305-MJC Doc 58 Filed 04/18/24 Entered 04/18/24 18:07:33 Desc
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